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IBRAHIM AMEEN ALHUSSEINI
8

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

12 United States of America

Case No. MJ24-6166

13 Plaintiff,

**STIPULATION FOR
MODIFICATION OF BOND
ORDER**

14 vs.

15 Ibrahim Ameen AlHusseini

Trial Date: Not Set

16 Defendant.

17
18
19 The defendant, IBRAHIM AMEEN ALHUSSEINI, through his counsel of
20 record, Aaron S. Dyer, Ronald L. Cheng, and Rebecca M. Lee, Esqs., is filing a
21 stipulation for modification of the original bond order issued by this Court on
22 Monday, October 21, 2024.
23

24 The following are the items which we request to be amended in the bond order:

- 25 • The surety contact listed at section 3.b.7 as "Wea Nichols," who is
posting \$250,000.00, should be included with her given name
26 "Winifred Nichols."

- 1 • The surety listed at section 3.c.1 (3616 Camp Creek Road,
2 Springfield, OR 97678), signed by Lekha Singh, will be signed in
3 the amount of \$425,000.00, will be replaced 89060 Old Mohawk
4 Road, Springfield, OR 97478.
- 5 • Listed under additional properties, the property listed at item (2),
6 address 4476 West Avenue 42, Los Angeles, CA 90065 will no
7 longer be included in the surety bond.
- 8 • Listed under additional properties, the property listed at item (3),
9 address 1672 Sandy Lily Dr., Golden, CO 80401, will be signed by
10 Julie Preger for the amount of \$125,000.00.
- 11 • Listed under additional properties, the property listed at item (4),
12 property located outside state of California to be signed by
13 responsible 3rd party approved by the government for the amount
14 of \$800,000, will be satisfied by the property located at 1001
15 Cooper Ave., Unit 5, Aspen, CO 81611, which is owned by LIB,
16 LLC and will be signed for by Melony Lewis.
- 17 • An additional property owned by JoDene Evans, located at 757
18 Palms Boulevard, Venice, CA 90291, will be signed for
19 \$625,000.00. Denmark West listed at 3.b.1 will no longer be
20 posting \$25,000.00 and should be deleted.
- 21 • Lekha Singh currently listed at 3.b.4 to post \$275,000.00 should be
22 increased to \$300,000.00.
- 23 • Modify the terms of the bond such that defendant can be released
24 since appraisals of the following two properties have confirmed
25 that their appraised values are in excess of the amount that will be
26 posted:
 - 27 ■ 89060 Old Mohawk Road, Springfield, OR 97478, which
28 has a confirmed appraised value of approximately
29 \$1,257,832 and will be signed for the amount of
30 \$425,000.00
 - 31 ■ 1001 Cooper Ave., Unit 5, Aspen, CO 81611, which has a
32 confirmed appraised value of \$6,000,000.00 and will be
33 signed for the amount of \$800,000.00.

This stipulation is supported by attached declarations of each surety.

Given that the terms of the bond as modified would be met with approval of this Stipulation, Defendant requests his release forthwith this Court's approval of such modification. This shall be provided to Pretrial Services Officer Connie Weng at Connie.Weng@cacp.uscourts.gov.

Dated: 11/08/2024

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Aaron S. Dyer
AARON S. DYER
RONALD L. CHENG
REBECCA M. LEE

Attorneys for Defendant
IBRAHIM AMEEN ALHUSSEINI

Dated: 11/08/2024

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